

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Timothy John Keer  
Clara M. Keer

Debtors

Ditech Financial LLC

Movant

vs.

Timothy John Keer  
Clara M. Keer

Debtors

William C. Miller

Trustee

CHAPTER 13

NO. 16-10933 ELF

**MOTION FOR EXTENSION OF TIME TO FILE STIPULATION**

Movant, through their attorney, KML Law Group, P.C., hereby requests an extension due to the reasons as stated below;

1. The Deadline to file the Stipulation is currently scheduled for January 11, 2018.
2. The parties are attempting to settle on the terms and will require additional time before the pleading can be filed.
3. Both Movant and Respondent concur to this request.

WHEREFORE, Movant requests that the filing deadline be extended to January 25, 2018.

January 11, 2018

**/s/ Kevin G. McDonald, Esquire**

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CHAPTER 13  
BK NO: 16-10933 ELF

**ORDER GRANTING EXTENSION**

Upon consideration of Movant's Motion requesting extension, it is hereby;

ORDERED that the deadline to file the Stipulation be extended to .

By the court:

Dated:

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United States Bankruptcy Judge